

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,)
)
)
)
v.) Case No. 23-cr-10186-ADB-10
)
DE'VONNE MCDONALD-JONES,)
)
)
Defendant.)

MOTION FOR RULE 11 HEARING

De'vonne McDonald-Jones hereby requests a hearing under Federal Rule of Criminal Procedure 11. Mr. McDonald-Jones is charged with racketeering conspiracy, in violation of 18 U.S.C. § 1962(d), based on his association with members of an “enterprise” described as the “Heath Street gang.” Mr. McDonald-Jones expects to plead guilty to violating the statute at issue based on two predicate acts: (1) possession with intent to distribute controlled substances (cocaine base) and (2) wire fraud, involving Paycheck Protection Program loans under the CARES Act. He expects to plead guilty pursuant to a plea agreement. However, as noted in that plea agreement, Mr. McDonald-Jones and the Government have not come to an agreement on the applicable total offense level under the United States Sentencing Guidelines (the “Guidelines”), and so that issue will be resolved at sentencing. More specifically, Mr. McDonald-Jones understands the Government will argue that he should also be held criminally responsible for a non-fatal shooting event that allegedly involved two other members of the Heath Street gang, which occurred on or about April 23, 2020. Mr. McDonald-Jones does not agree and has reserved the right to challenge the Government’s Guidelines calculations, among other things.

Accordingly, Mr. McDonald-Jones requests that the Court schedule a Rule 11 hearing at its earliest opportunity.

Dated: July 9, 2025

Respectfully submitted,

De'vonne McDonald-Jones,

By his attorney,

/s/ Michael T. Packard

Michael T. Packard (BBO #676934)
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
111 Huntington Avenue, Suite 520
Boston, MA 02199
(617) 712-7100
michaelpackard@quinnmanuel.com

CERTIFICATE OF SERVICE

I hereby certify that on July 9, 2025, a true copy of the above document was served by eFile and email upon all counsel of record.

/s/ Michael T. Packard